

October 30, 2007

Ms. Jennifer Thangavelu
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: First State PAC
FEC ID No. C00363648

Dear Ms. Thangavelu:

This is in response to your letter dated October 17, 2007, concerning the Mid-Year Report (1/1/07-6/30/07) of First State PAC (the "Committee").

You ask about expenditures for "Catering," "Catering and Room Rental," "Catering/Lodging/Transportation," "Catering/Meals/Office Expenses," "Fundraising Consulting Services," and "Catering/Office Expenses" on Schedule B. These expenditures were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.

You state that "Political Consulting Services" is not an acceptable purpose for disbursements. The Committee will amend its report to clarify the purpose listed.

You also ask about reimbursements to individuals. The Committee will amend its report to itemize original vendors where necessary. Please note that the payments for consulting services were made to the original vendors.

Finally, you ask about payments for administrative expenses. First State PAC is a small committee and has few administrative expenses. The committee currently has no paid staff and sublets a small office for which it pays for its annual rent in advance in one payment. It relies primarily on its consultants and volunteers to administer the Committee's activities. All expenses incurred to operate the Committee, including payments to consultants, have been reported as federal operating expenditures on the Committee's FEC reports.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc Elias
Counsel to First State PAC
